

III. REMARKS

Claims 1-34 are pending in this application. Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-34 are rejected under 35 U.S.C. §102(b) as allegedly being anticipated by either Baker *et al.* (U.S. Patent No. 5,422,821), hereafter "Baker."

With regard to the 35 U.S.C. §102(b) rejection over Baker, Applicant asserts that Baker does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 8, 16, 20, 28 and 33, Applicant submits that Baker fails to teach affixing an identifier associated with a mailing address, that comprises all information necessary for routing the hardcopy mail to a location of the recipient, to a piece of hardcopy mail in lieu of the mailing address. The passage of Baker cited by the Office teaches "...placing a routing code on the mail piece corresponding to the address." Col. 2, lines 52-54. To this extent, the routing code of Baker corresponds to the address. However, Baker never teaches that the routing code is in lieu of the address. Rather, Baker teaches that an operator "...reads at least part of each mail piece and enters corresponding information to determine whether a bar code can be assigned." Col. 7, lines 6-9. One example given by Baker of an address that may be read by the operator is:

John Doe
1234 Main Street
Hometown, Homestate 99999. Col. 8, lines 1-3.

After the operator of Baker has supplied information from the mail piece to the system, the system may print the corresponding barcode on the detected mail piece. Col. 9, lines 64-65. As such the barcode of Baker is printed onto the same piece of mail from which the address was read by the operator. Accordingly, the barcode of Baker is in addition to and not in lieu of the address. Nowhere does Baker teach that its barcode is in lieu of an address.

In contrast, the claimed invention includes "...electronically associating a mailing address with the identifier, the mailing address comprising all information necessary for routing the hardcopy mail to a location of the recipient...[and] affixing the identifier to a piece of hardcopy mail in lieu of the mailing address." Claim 1. As such, in contrast to Baker, in the current invention, the identifier is affixed to the piece of hardcopy mail in lieu of the mailing address. For the above reasons, the routing code on the mail piece corresponding to the address Baker does not teach the identifier of the claimed invention. Accordingly, Applicant requests that the rejection be withdrawn.

With respect to dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

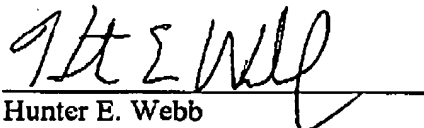
IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. These features have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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